



KEMAJUAN AGRO PRATIWI KORPORASI
Agro Business and Oil Palm Plantation Development

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Jakarta, March 15, 2000

Docket Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket Number 95P-0036

Here with we would like to make petition statement that we do **not agree with** the FDA's proposal to require that labels include trans fat **together** with saturated fat. However, I strongly support the FDA's intention to limit the amount of trans fat in foods.

One of the main purposes of labeling-as the name of the act imply: Nutritional Labeling and **Education Act**-is to promote fair trade and to educate the consumers. This is achieved by providing true and clear information printed in the label.

With this in mind, labeling of saturated fat/saturated fatty acid (**SFA**) must be separated with labeling of Trans fat/Trans fatty acids (**TFA**). Consumer must have the right to be informed about what kind of fat they are consuming. whether it's **SFA** or **TFA**. The two kinds of fats should not be grouped and named as one (**as Saturated Fat**) because they actually are not the same, chemically, biologically and physiologically. Some researchers have shown that the two kinds of fats (**SFA and TFA**) have different effect on health, especially on coronary heart disease. Some researchers have even suggested that **TFA** have more negative effect on health as compared to those of **SFA**.

SO, it is only logical and fair to provide complete information in the label, as the following:

1. Labeling of **TFA** and **SFA** must be printed separately in the label. **TFA** and **SFA** are two different kinds of fats, and consequently they must be declared separately. **SFA** is not associated with **TFA** in anyway.
2. One product may be declared or labeled as trans fat free-because they are-without any requirement or consideration of **SFA** content.

With those labeling, the purpose of the **NLEA** can be preserved fairly based on scientific reason. This should not be mixed and confused with the trade competition. Again, trade should be done fairly, and consumer have the right to know and be assured that all necessary information needed for making buying decision are printed clearly in the label.

Consequently, we believe that Grouping **SFA** into one category with **TFA** is misleading, since they have different physiological and biological effect on human health. Attempt to Group **SFA** and **TFA** into one category is not wise decision, and may endanger public health

Sincerely,
PT. Kemajuan Agro Pratiwi Korporasi

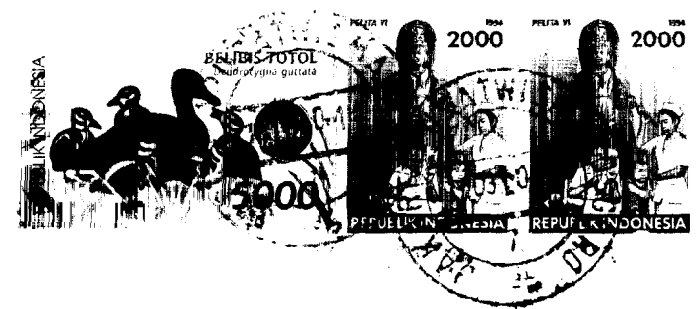
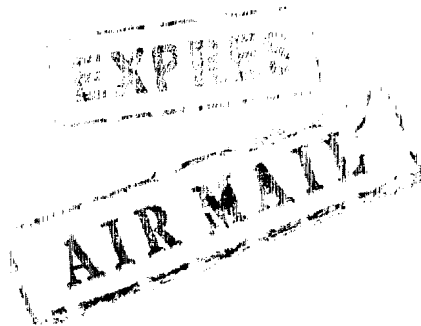
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